## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

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UNITED STATES OF AMERICA	) No. 1:17cr104
v.	) Count 1: 18 U.S.C. § 1344 & 2
THOMAS SCOTT BROWN,	) (Bank Fraud)
	) Count 2: 18 U.S.C. § 1014 & 2
	) (False Statement to a Financial Institution)
Defendant.	)
	)

## Criminal Information

The United States charges that:

## Count 1 (Bank Fraud)

From at least in or around June 2006 and continuing through at least in or around August 2007, in the Eastern District of Virginia and elsewhere, the defendant, Thomas Scott Brown, did knowingly execute and attempt to execute, a scheme and artifice to defraud a financial institution, and to obtain any of the money, funds, credits, assets, securities, and other property owned by, and under the custody and control of, a financial institution, by means of materially false and fraudulent representations. More specifically, from in or around June 2006 and continuing through at least in or around August 2007, Brown engaged in and executed a scheme to defraud Navy Federal Credit Union ("NFCU"), a financial institution, by directing other individuals to apply for membership with NFCU in order to obtain various home equity loans by fraudulently representing to NFCU that the borrowers purchased and owned the properties free and clear of any liabilities, when in fact, these individuals owed Brown for the properties.

(All in violation of Title 18, United States Code, Sections 1344 & 2)

## Count 2 (False Statement to a Financial Institution)

On or about February 21, 2007, in the Eastern District of Virginia, and elsewhere, defendant, Thomas Scott Brown, knowingly made, willfully caused to be made, and knowingly aided, abetted, counseled, commanded, and induced others who knowingly made false statements for the purpose of influencing the action of Navy Federal Credit Union, a financial institution that was insured by the Federal Deposit Insurance Corporation, in connection with an application, advance, discount, purchase, purchase agreement, repurchase agreement, commitment, and loan.

(All in violation of Title 18, United States Code, Sections 1014 & 2)

Dana J. Boente United States Attorney

By:

Tayhar K. Walker Assistant U.S. Attorney